

TONI H. WHITE (SBN 210119)
ATTORNEY AT LAW
PO Box 1081
El Dorado, CA 95623
Telephone: (530) 885-6244

Attorney for Defendant
IL CHUNG

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IL CHUNG

Defendants.

CASE NO. 2:21-cr-00207-TLN

**STIPULATION REGARDING
CONTINUANCE OF STATUS
CONFERENCE; FINDINGS
AND ORDER**

STIPULATION

The defendant, Il Chung, by and through his counsel, Toni White, and the Government, by and through its counsel, Audrey Hemesath, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 14, 2022
2. By this stipulation, the above-named defendant now moves to continue the status conference until October 20, 2022, at 9:30 a.m., and to exclude time between July 14, 2022, and October 20, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Discovery in this case consists of approximately 24,000 pages of investigative reports in electronic form and some audio files. Additional discovery is forthcoming.
 - b) Defense counsel needs additional time to continue to review discovery, to continue to consult with her client, review the current charges, conduct investigation and research related

1 to the charges and to discuss potential resolutions with their clients and otherwise prepare for
2 trial.

3 c) Defense counsel believes that failure to grant the above-requested continuance would
4 deny her reasonable time necessary for effective preparation, taking into account the exercise
5 of due diligence.

6 d) The Government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the case
8 as requested outweigh the interest of the public and the defendant in a trial within the original
9 date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
11 seq., within which trial must commence, the time period of July 14, 2022 to October 20,
12 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
13 Code T4] because it results from a continuance granted by the Court at defendant's request on
14 the basis of the Court's finding that the ends of justice served by taking such action outweigh
15 the best interest of the public and the defendants in a speedy trial.

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DATED: July 12, 2022

DATED: July 12, 2022

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 12th day of July, 2022.


Troy L. Nunley
United States District Judge